

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, *et al.*,

Defendants.

Civ. No. 1:16-cv-00563 (TSE/TCB)

**JOINT STIPULATION ADOPTING THE
PARTIES' PRIOR JOINT STIPULATION OF UNCONTESTED FACTS**

The parties, by counsel, hereby jointly stipulate that they adopt the parties' prior Joint Stipulation of Uncontested Facts (Dkt. 180) except that Fact I(A)(1) should state that "Plaintiffs lived at Waples Mobile Home Park (the 'Park')". The parties reserve the right to modify this stipulation and will continue to discuss additional potential stipulations of fact in advance of trial.

December 4, 2020

Respectfully submitted,

/s/

LEGAL AID JUSTICE CENTER
Simon Sandoval-Moshenberg (VSB #77110)
Nady Peralta (VSB #91630)
6066 Leesburg Pike
Suite 520
Falls Church, VA 22041
(703) 778-3450 (Telephone)
(703) 778-3454 (Facsimile)
simon@justice4all.org
nady@justice4all.org

QUINN EMANUEL URQUHART
& SULLIVAN, LLP
Kaiyeu Kevin Chu (VSB #85746)
Matthew Traupman (*pro hac vice*)
Gianna Puccinelli (*pro hac vice*)
1300 I Street N.W.
Suite 900
Washington, D.C. 20005
(202) 538-8000 (Telephone)
(202) 538-8100 (Facsimile)
kevinchu@quinnemanuel.com
matthewtraupman@quinnemanuel.com
giannapuccinelli@quinnemanuel.com
Counsel for Plaintiffs

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP,
WAPLES PROJECT LIMITED PARTNERSHIP
AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/
Grayson P. Hanes (VSB #06614)
Michael S. Dingman (VSB #30031)
Justin deBettencourt (VSB #83806)
REED SMITH LLP
7900 Tysons One Place
Suite 500
McLean, Virginia 22102
(703) 641-4200 (Telephone)
(703) 641-4340 (Facsimile)
ghanes@reedsmith.com
mdingman@reedsmith.com
jdebettencourt@reedsmith.com
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of December, 2020, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing (NEF) to all counsel of record.

/s/

Grayson P. Hanes (VSB #06614)
Michael S. Dingman (VSB #30031)
Justin deBettencourt (VSB #83806)
REED SMITH LLP
7900 Tysons One Place
Suite 500
McLean, Virginia 22102
(703) 641-4200 (Telephone)
(703) 641-4340 (Facsimile)
ghanes@reedsmith.com
mdingman@reedsmith.com
jdebettencourt@reedsmith.com
Counsel for Defendants